



April, 2, 1997

**Education &
Library
Networks
Coalition**

Alliance for Community Media
American Association for Adult and
Continuing Education
American Association of School
Administrators
American Library Association
American Psychological Association
Association for Education
Communications and Technology
Association for Supervision and
Curriculum Development
Association for the Advancement of
Computing in Education
Center for Media Education
Consortium for School Networking
Council for American Private
Education
Council for Educational
Development and Research
Council of Chief State School Officers
Education Legislative Services, Inc.
Educational Testing Service
Federation of Behavioral
Psychological and Cognitive
Services
International Society for Technology
in Education
International Telecomputing
Consortium
Lutheran Church-Missouri Synod
National Association of Counties
National Association of Elementary
School Principals
National Association of Independent
Schools
National Association of Secondary
School Principals
National Association of State Boards
of Education
National Association of Student Financial
Aid Administrators
National Catholic Educational Association
National Education Association
National Grange
National Rural Education Association
National Rural Electric Cooperative
Association
National School Boards Association
Organizations Concerned about
Rural Education
People for the American Way
Action Fund
The Global Village Schools Institute
United States Catholic Conference
United States Distance
Learning Association

VIA HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

RE: Ex Parte Presentation in CC Docket 96-45

Dear Mr. Secretary:

Pursuant to 47 C.F.R. § 1.1206, the Education and Library Networks Coalition (EdLiNC) submits this original and one copy of a letter disclosing a written and oral presentation in the above-captioned proceeding.

On this date, the following individuals conferred in person: Michelle Richards, National School Boards Association; Andrew Magpantay, American Library Association; Kari Arfstrom, American Association of School Administrators; Chris Collins, National Association of Independent Schools; Barbara Stein, National Education Association; Mark Nadel, Federal Communications Commission; and James Rubin, Federal Communication Commission.

The meeting dealt with EdLiNC's proposals regarding the implementation of Section 254 (h) of the Communications Act, as added by the Telecommunications Act of 1996, including the administration and application process.

In accordance with public notice D.A. 95-211 released February 10, 1995, two copies are being forwarded of materials distributed at the meeting including a Working Paper on Implementing Universal Service for Schools and Libraries; purchasing and bidding policies from Hurst Eulless Bedford Independent School District in Bedford, Texas and the Board of Education of Washington County in Hagerstown, Maryland; and the *electronic school*, March, 1997. Please contact the undersigned with any questions.

Very truly yours,

Michelle Richards
National School Boards Association
703-838-6208

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Working Paper

Implementing Universal Service for Schools and Libraries

As the Federal Communications Commission works to make its final ruling on the implementation of Universal Service for schools and libraries under the Telecommunications Act of 1996, a few issues need to be addressed for schools and libraries to fully participate. This working paper is offered as a recommendation for some outstanding issues such as the application process, technical assistance, auditing procedure, and program accountability.

Application Process

The act of submitting a bona fide request for discounted services can be carried out by the applicant in the following manner. The likely applicants for the educational discount include: school districts, non-public schools, libraries, consortiums made up of any or all of the above mentioned applicants, and/or a state agency or consortium of state agencies applying on behalf of any or all of the above mentioned applicants. Allowing schools and libraries to aggregate their purchases in consortia as described is consistent with the Joint Board Recommendation at 596 which affirmed the benefits of permitting schools and libraries to join in consortia with other customers in their community.

We concur with the Joint Board that this process should be easy-to-administer and non-bureaucratic. A simple bona fide request form that indicates the entities request for proposals, whether the applicant has service contracts in place, and the level of discount sought would be submitted to the federal Fund Administrator. Applicants would also be able to certify that they have a plan in place that is commensurate with the level of technology they are seeking.

EdLiNC notes that nothing in Section 254(h)(4) or 254(h)(5) of the Act requires that an institution have a plan for securing access to supporting technologies in order to be an institution eligible for discounts. The language in Section (254)(h)(4) and 254(h)(5) specifies only that the institution be an eligible non-profit institution, and, if a library, is eligible for assistance from a State library administrative agency under the Library Services and Technology Act, or if an elementary or secondary school, has an endowment of \$50,000,000 or less and is an elementary or secondary school as defined in paragraphs (14) and (25), respectively, of section 14101 of the Elementary and Secondary Education Act of 1965 (20 U.S.C. 8801) as amended in Public Law 103-382, October 20, 1994.

Nonetheless, all the elements in our February 25, 1997 ex parte submission on self-certification do correspond to the elements listed in paragraphs 601-604 of the Joint Board Recommended Decision, including self-certification that the eligible institutions have, as stated in paragraph 601, "done their homework."

Furthermore, EdLiNC recommends that if the FCC does go beyond the eligibility requirements stated in Section (254)(h)(4) and 254(h)(5) and requires self-certification by the applicant of the existence of a technology plan, that the FCC be very explicit in stating that such self-certification does not require the review or approval of the technology plan by the FCC, the fund administrator, or any other entity. Paragraph 604 of the Joint Board Recommendation states that "the Commission instruct the fund administrator to permit schools and libraries to self-certify that they have met the requirements discussed above. Under this approach **no applicant would be forced to wait for approval from a designated entity before arranging deployment**, once it had filed its self-certifications with the entity or the universal service administrator. (Emphasis added.)" No entity should be involved in specifying the nature of educational or library technology plans that have been or are already being developed for other federal, state, or local programs. Such review or approval would constitute an unwarranted intrusion into the administration of libraries and schools.

The Fund Administrator's role is one of facilitator, not as evaluator or judge of local technology plans. As such, it is essential that the fund administrator be a "neutral" entity. Processing bona fide requests through any other party (i.e. state or regional educational or library entities) could pose a conflict of interest as those parties may, in fact, be requesting services on behalf of consortia. Moreover, it is also vital that the Fund Administrator include not just representatives from industry, but also from the education and library field. Specifically, we recommend that the board that governs the Fund Administrator include representation from both the school and library communities that is equal to other entities. These members should be nominated from a broad range of education and library groups, keeping in mind the diversity within libraries, and especially of schools. In addition, it is vital that the staff of the Fund Administrator include individuals knowledgeable about the education and library field.

Assistance with Universal Service Applications

To properly implement Universal Service for schools and libraries, schools and libraries may need start-up assistance with the procedures for applying for universal service discounts. Because this is a new program, there are likely to be questions relating to the application process, discounts and services covered. Those "application questions" can be handled by the federal fund administrator. However, we believe that there are opportunities to "partner" with a variety of federal, state and regional entities as well as private-non-profit entities to assist with dissemination of information about the program. We also believe that the announcement of the new discounts is an opportunity to provide schools and libraries with further resources and contacts to help them craft their technology plans.

Existing entities are already available to assist school districts and libraries with technical questions that may arise when applicants write their technology plans. Moreover, many

applicants will have an existing plan on record already, which may only require perfunctory changes. However, technical assistance will be valuable when applicants review their existing documents and upgrade their existing connectivity devices.

The following entities are optimal for assisting applicants with technical questions. The technology office of the pertinent state agency, regional labs, existing regional and national associations and the Department of Education. These are all likely sources where applicants will seek to answer their questions. We propose that the FCC, in consultation with EdLiNC and other interested education, library and industry partners, facilitate the technical assistance and program information dissemination process by:

1. Publishing an official Universal Service for Schools and Libraries "Kit." This kit would include information about the new rules, a fact sheet of the law, clear instructions on the bona fide request process, sample and blank forms required by FCC, sample model technology plans, and a list of resources and contacts. The resources would include the fund administrator for questions regarding the application as well as the federal, state, regional and non-profit entities described above.
2. Disseminating the kit through various avenues including the Department of Education and EdLiNC member organizations to raise awareness of the program.
3. Ongoing training opportunities for federal, state and regional and non-profit entities that may be asked basic questions about the program.
4. Posting of the Kit on the FCC web site as well as the web sites of the federal, state, regional and non-profit entities.

Auditing Procedure

It is important to recognize that fiscal activity in schools and libraries currently has a high level of public accountability. For example, public school districts produce their annual budgets in an open process that is debated publicly in local communities. Typically, a budget is proposed, public meetings are held to discuss the budget, and the locally elected school board will hold a public vote on the budget. That budget is subject to audit and oversight as is the budget of any government entity. In addition, schools and libraries are already subject and accountable to state and local laws governing procurement and bidding.

It is critical that the auditor be a neutral third party. Therefore, utilizing state or regional education or library entities to perform random audits could pose a conflict of interest as they are likely to be requesting services on behalf of consortia. We recommend that the Fund Administrator randomly audit some amount of applicants to determine payment for services, level of discount, and the existence of a technology plan. Entities found not in compliance would be required to remedy the error. However, as with any of the

procedural steps in the overall administration of this program, existent audits, plans or other processes should be used in the report, analysis and evaluation process. No new bureaucratic procedures should be established. As the Joint Board recommends in Paragraph 605, "schools and libraries, as well as carriers, [should] be required to maintain for their purchases of telecommunications and other covered services at discounted rates **the kinds of procurement records that they already keep for other purchases.** [emphasis added]"

Progress

It is very important for the FCC to periodically monitor implementation of the Act as it relates to improved access to telecommunications services for schools and libraries. This is especially true for access to advanced telecommunications capability which the Commission, according to Section 706, "shall encourage deployment of on a timely basis to all Americans (including, in particular, elementary and secondary schools and classrooms)." The Fund Administrator should be a source of primary data on access, requests for access, costs, equity of distribution, adequacy of the fund, and other factors (i.e., competition, number of providers, etc.) relating to the Commission's on-going assessment of how effective its own rules are in improving access.

The FCC and/or the Fund Administrator should NOT attempt to track other data on the usage of technology or its effectiveness in the educational process. Assessment of the effectiveness of technologies in the educational process should be reserved as an educational function best performed by the US Department of Education, various other federal agencies (e.g., National Science Foundation, National Commission on Library and Information Science), State agencies, and/or appropriate school and library authorities.

4/1/97

PURCHASING PROCEDURES

I. Responsibility

The Purchasing Department shall be responsible for the procurement of all improvements, materials, supplies, equipment, and services that are essential to the overall operation of the Washington County Public School System.

All negotiations between the Board of Education and contractors or vendors involving improvements, materials, equipment, supplies and/or services shall be conducted by, or with the approval of the Purchasing Department.

All contractual agreements between the Board of Education and a contractor involving financial consideration of public funds in exchange for materials, equipment, supplies, or services must be made on purchase orders or contract forms that specify all the contractual obligations. All contracts must be signed by the Superintendent of Schools or his authorized representative.

Salespersons should not be permitted in schools for the purpose of making sales which commit the Board of Education. When it is necessary for schools to consult salespersons regarding special or highly technical details of their products, they should request such visits through the Purchasing Department and the school administrator. Under all circumstances, salespersons must have authorization to visit schools. Department heads and employees with budgetary responsibility are encouraged to test new products and to be kept informed about the products and services for their areas. When testing and reviewing products with salespersons, they are to remind salespersons not to ship products until they have received an approved purchase order. Contracting with suppliers for the purpose of placing orders shall be through the Purchasing Department except in cases of an emergency with the authorization of the Superintendent or his/her designee. In cases where technical details make delegation of authority advisable, a copy of the quotes or other pertinent information should be forwarded to the Purchasing Department.

II. Function

A. Establish Price

The function of the Purchasing Department is to obtain, without favor or prejudice, the proper amount of the suitable product at the best possible price and to have it available when it is needed. Each order shall be placed on the basis of quality, safety, price, delivery and service. Maintenance of products shall be a consideration of purchase.

The Purchasing Department will conduct all procurement transactions in accordance with federal and state laws, and the rules and regulations of the Board of Education, and as approved by legal counsel.

B. Competitive pricing is obtained through the use of advertised bids, written price quotations, and oral price quotations. Bids will be solicited from those sources able to offer the best prices consistent with quality, delivery and service.

The following criteria shall be used to determine the method employed by the Purchasing Department in obtaining prices that are not currently on bid.

1. Purchases of \$1,500 to \$5,000 – Where the cost of any school improvements, supplies, or equipment of any sort of at least \$1,500 but not more than \$5,000, telephone and written quotations from a minimum of three responsible vendors shall be obtained.

2. Purchases of \$5,001 to \$15,000 -- Where the cost of any school improvements, supplies, or equipment of any sort of at least \$5,001 but not more than \$15,000, competitive written quotations from at least three vendors will be obtained by the Purchasing Department and attached to, or cited on, the file copy of the purchase requisition.
3. Purchasing of \$15,000 and above -- Where the cost of any school improvements, supplies, or equipment of any sort is at least \$15,000, the Purchasing Department shall invite formal bids and use the guidelines as outlined in the Maryland State Public Schools by-laws.

In the event a service or product is requested that is not conducive to bidding, a waiver of the bid requirement may only be granted by the Superintendent upon receiving a positive recommendation from the Purchasing Department.

The Purchasing Department shall bid all like items or services together when received within the department separately at approximately the same time, if the grand total of the items or services are \$15,000 or above.

4. This procedure does not apply to Architectural and Engineering services.

All written quotations must be addressed to and mailed directly to the Purchasing Department, not through the initiating department.

C. Advertising

All newspaper advertising shall be accomplished by the Purchasing Department. The Purchasing Department shall insure that adequate geographic coverage of the content of the advertisement is effected. In placing the advertisement, due consideration shall be given to volume circulation and cost per circulated copy.

D. Bid Instructions and Specifications

It is the responsibility of the originating department, in conjunction with the Purchasing Department, to see that bid instructions and specifications should be clear, complete and conducive to competitive bidding. All plans and specifications should be available to all persons who wish to bid thereon in order to enable them to compete on an equal basis and without favoritism. If during the bidding it is necessary to add an addendum to the bid, it shall be the Purchasing Department's responsibility to inform perspective vendors.

E. Awards

The lowest responsible bidder meeting specifications to include "quality, services and delivery" shall be awarded the contract. Any exception to low bidder must be presented to the Superintendent and approved by the Board of Education at a regularly scheduled meeting.

In the event of tie bids where all other factors, such as past performances, are considered comparable, the award shall first be made to the Washington County-based vendor, then to the in-state and then to the out-of-state based vendor in that order of preference.

F. Objections to Bid Procedures

Any vendor objecting to the bid procedure or the recommendations for award may protest the Purchasing Department's action by formally notifying the Superintendent of Schools in writing.

Objections to an award made by the Board of Education must be filed within ten (10) days following the date of award by the Board of Education.

G. Vendor Selection

Vendor selection and the maintenance of a bidder's list will be a function of the Purchasing Department. Quality, reliability, fair pricing, and sincerity in relations are factors which will be considered when selecting or continuing a vendor on the bidder's list.

Potential bidders must have adequate financial standing and facilities to discharge their commitments. Before any negotiations are conducted or bid invitations submitted for the first time, a satisfactory financial report on prospective vendors will be obtained if applicable. Further, an attempt will be made to determine the capability of the firm to satisfy the contractual relationship.

Vendors will be given an opportunity to present their products and every effort will be made to establish strong and lasting relations with proven supplies. A vendor may be deleted from the bidders list if they have not responded in any manner for three (3) consecutive bids.

H. Catalog File

The Purchasing Department will maintain, for the use of all departments and offices, a file of current trade catalogs to keep other departments informed of new materials, services, sources, prices and processes in manufacturing.

I. Product Testing

Material delivered on any invitation to bid may be examined and tested for compliance with stipulated specifications. The Board of Education reserves the right to use all submitted material in any manner which may best serve in the final determination of successful bidder, even if said examination and test results in damage to or destruction of the sample. The cost of testing a representative sample from products supplied after a contract is awarded shall be borne by the Board of Education of Washington County except where there is a failure to meet the requirements of the specifications. In such a case, the cost of testing shall be charged to the vendor.

J. Delivery Information

The Purchasing Department will provide vendors with all delivery instructions and destinations whether they be for central offices, warehouse, or specific schools.

K. Purchase Requisitions

All equipment, supplies and services requested by schools and departments must use the requisition forms prescribed by the Purchasing Department. (Sample #1)

Each requisition requires a complete description of the equipment, supplies, and/or services being requested. A complete description is essential in order that the Purchasing Department may satisfactorily solicit price proposals.

The requisition shall be initiated by the department having budgetary responsibility and approved by the area director.

L. Blanket Purchase Orders

Blanket purchase orders are issued to cover the acquisition of high volume low value parts and supplies. Blanket purchase orders will have a transaction limitation based upon the type of materials to be purchased, but in no event shall they exceed \$1,000 per transaction or \$5,000

per year. Blanket orders will be individually reviewed to determine if they are to be renewed for a subsequent year. Blanket orders are intended to reduce administrative paperwork and to provide user departments flexibility in obtaining high volume materials. They are not to be used for purchasing long-term shelf inventories and fixed assets or to circumvent the state bidding laws.

M. Confirming Purchase Orders

Confirming purchase orders are to be used only for emergency situations where the Board of Education would experience a financial loss or an interruption in normal operations.

N. Invoice Procedures

All invoices are to be submitted directly to the Accounts Payable section of the Accounting Department. Vendors will be encouraged to reference purchase order numbers of their invoices. Invoices received without an approved purchase order will be returned to the vendor.

O. Authorization Forms

Authorization forms (Sample #2) will be used primarily for the following purposes:

- (1) Employee advances
- (2) Prepayment of travel costs or conference costs
- (3) Reimbursable personal expenditures for less than \$20 (i.e. supplies for meeting, local parking)

The authorization form also requires the approval of a department director.

Bedford, TX

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PURCHASING:
BIDDING REQUIREMENTS

(LOCAL)

- BID PROCESS** All bids shall be submitted in sealed envelopes, plainly marked with the name of the bid and the time of the bid opening. Bids shall be opened at the time specified. All bidders and other interested parties shall be invited to attend the bid opening.
- OPENING BIDS** The Board delegates to the director of purchasing the authority to open bids, preferably in the presence of another administrator.
- BID ACCEPTANCE** The Board has authority to reject any and all bids. On bids that are not required by law, the Board shall accept the bid it deems to be in the best interest of the District. Quality and suitability of the product, and not price alone, shall be considered in the acceptance of bids. Consideration shall also be given to the bidder's references and record for responsibility, knowledge of the product, and service.
- DELEGATION** The Board may delegate to the Superintendent or designee the authority to accept or reject bids on purchases of goods or services not required by law to be bid. On bids required by law, the Superintendent or designee shall evaluate the bids and make a recommendation to the Board.
- SAFETY RECORD** The Board may take the safety record of bidders into account in determining who is the lowest responsible bidder for projects required to be bid under Local Government Code 271.024. The safety record shall be defined as a bidder's OSHA (Office of Safety and Health Administration) inspection logs for the last three years, a loss analysis from a bidder's insurance carrier, and a loss history covering all lines of insurance coverage carried by the contractor.
- The Board shall determine the acceptable OSHA record and loss history for each project at the time bid specifications are established and shall include those criteria in the bid notice.
- AWARD OF BIDS** A bid recap sheet shall be prepared and forwarded to the associate superintendent of business operations for presentation to the Superintendent and Board.

PURCHASING:
BIDDING REQUIREMENTS

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This exception shall not apply to mainframe data-processing equipment and peripheral attachments with a single-item purchase price in excess of \$10,000.

Education Code 21.901(g)

BID-NOTICE
PUBLICATION

Notice of when and where contracts will be let and bids opened shall be published in the county where the school is located once a week for at least two weeks prior to the time set for letting the contract. Where the contract involves less than \$25,000, such advertising may be limited to two successive issues of any newspaper published in the county where the school is located.

Education Code 21.901(d)

CERTAIN CONTRACTS
(\$10,000 OR MORE)

All of the following provisions apply only to bidding for certain contracts involving \$10,000 or more.

When the contract for the construction, repair, or renovation of a structure, road, or an improvement or addition to real property, or for materials used in such construction, repair, or renovation involves \$10,000 or more, the Board shall advertise and award bids as provided below. *Loc. Gov't. Code 271.024*

NOTICE

The advertisement shall include a notice that:

1. Describes the work.
2. States where the bidding documents, plans, specifications, or other data may be examined by all bidders.
3. States the time and place for submitting bids.
4. States the time and place where bids shall be opened.

Loc. Gov't. Code 271.025(a)

PUBLICATION

When the contract is one that would also be subject to competitive bidding under Education Code 21.901, the notice shall be published as required under those provisions. When the contract is for the construction, repair, or renovation of a structure other than a building, a road, or other improvement or addition to real property not covered by Education Code 21.901, the advertisement shall be published at least twice in one or more newspapers of general circulation in the county or counties in

PURCHASING:
BIDDING REQUIREMENTS

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which the work is to be performed. The second publication shall be on or before the tenth day before the first date bids may be submitted. *Education Code 21.901(d), Loc. Gov't. Code 271.025(b)*

ADDITIONAL
NOTICE
(\$10,000 OR
MORE)

In addition, the Board shall mail the notice described above to any organization that requests in advance that notices for bids be sent to it, agrees in writing to pay the actual cost of mailing the notice, and certifies that it circulates notices for bids to the construction trade in general. This additional notice shall be mailed not later than the date on which the first required notice is published in a newspaper. *Loc. Gov't. Code 271.025(c)*

OPENING
OF BIDS

Bids shall be opened only by the Board at a public meeting or by an officer or employee of the District at or in an office of the District. A bid that has been opened may not be changed for the purpose of correcting an error in the bid price. *Loc. Gov't. Code 271.026*

AWARD OF BID
(\$10,000 OR
MORE)

The Board shall have the right to reject any and all bids. Contracts shall be awarded to the lowest responsible bidder, but a contract may not be awarded to a bidder who is not the lowest bidder unless prior to the award each lower bidder is given notice of the proposed award and is given an opportunity to appear before the Board or a designated representative of the Board and present evidence concerning the bidder's responsibility.

In determining who is a responsible bidder, the Board may take into account the safety record of the bidder, of the firm, corporation, partnership, or institution represented by the bidder, or of anyone acting for such firm, corporation, partnership, or institution, provided that the Board has:

1. Adopted a written definition and criteria for accurately determining the safety record of a bidder.
2. Given notice to prospective bidders, in the bid specifications, that the safety record of a bidder may be considered in determining the responsibility of that bidder.
3. Ascertained that such determination is not arbitrary and capricious.

Loc. Gov't. Code 271.0275

PURCHASING:
BIDDING REQUIREMENTS

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ENFORCEMENT OF
PURCHASING
PROCEDURES

A Trustee or employee shall not intentionally or knowingly make or authorize separate, sequential, or component purchases to avoid the competitive bidding requirements set out in this policy.

"Component purchases" means purchases of the component parts of an item that in normal purchasing practices would be made in one purchase. "Separate purchases" means purchases, made separately, of items that in normal purchasing practices would be made in one purchase. "Sequential purchases" means purchases, over a period, of items that in normal purchasing practices would be made in one purchase.

Violation of this provision is also a Class B misdemeanor and an offense involving moral turpitude, conviction of which shall result in removal from office or dismissal from employment.

Education Code 4.35(a), 21.9011; Loc. Gov't. Code 271.021, 271.029, 271.030

TIE BIDS

If the District receives two or more bids from responsible bidders that are identical, in nature and amount, as the lowest and best bids, it shall select only one bidder from the identical bids.

If only one of the bidders submitting identical bids is a resident of the District, that bidder shall be selected. If two or more such bidders are residents of the District, one shall be selected by the casting of lots. In all other cases, one of the identical bids shall be selected by casting of lots.

The Board shall prescribe the manner of casting lots and shall be present when the lots are cast. All qualified bidders or their legal representatives may be present at the casting of lots.

Loc. Gov't. Code 271.901

AWARD OF BID
(ANY AMOUNT)

The Board shall not award a contract for general construction, improvements, services, or public works projects or purchase of supplies, materials, or equipment to a bidder whose principal place of business is not in this state, unless the nonresident's bid is lower than the lowest bid

PURCHASING:
BIDDING REQUIREMENTS

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submitted by a responsible Texas resident bidder by the same amount that a Texas resident bidder would be required to underbid a nonresident bidder to obtain a comparable contract in the state in which the nonresident's principal place of business is located.

This requirement shall not apply to any contracts involving federal funds. The District shall rely on information published by the State Purchasing and General Services Commission in evaluating and awarding bids under this requirement.

Art. 601g, Sec. 1(b),(c), V.A.T.S.

DOCUMENT OFF-LINE

This page has been substituted for one of the following:

- o An oversize page or document (such as a map) which was too large to be scanned into the RIPS system.

- o Microfilm, microform, certain photographs or videotape.

- o Other materials which, for one reason or another, could not be scanned into the RIPS system.

The actual document, page(s) or materials may be reviewed by contacting an Information Technician. Please note the applicable docket or rulemaking number, document type and any other relevant information about the document in order to ensure speedy retrieval by the Information Technician.

1 Magazine